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Criminal Complaint

UNITED STATES DISTRICT COURT

Eastern

DISTRICT OF

Michigan

UNITED STATES OF AMERICA

Leo Joseph RUDOLPH

AMENDED CRIMINAL COMPLAINT

Case Number: 0730302

JUN 19 2007
CLERK'S OFFICE
DETROIT

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief On or about April 2007 – June 2007 in Macomb County, in
the Eastern District of Michigan defendant(s) did,

(Track Statutory Language of Offense)

~~Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, shall be punished as provided under subsection~~ *and did have* *to wit: used VI (a nine year old)*
to produce sexually explicit images for use on the internet.

in violation of Title 18 United States Code, Section(s) 2251(a)

I further state that I am a(n) Special Agent and that this complaint is based on the
following facts:

Official Title

See attached Affidavit

Continued on the attached sheet and made a part of this complaint:

Yes



No



Signature of Complainant

M. Daniel Ben-Meir

Printed Name of Complainant

Sworn to before me and signed in my presence,

June 19, 2007

Date

at

Detroit, MI

City and State

The Honorable United States Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

AMENDMENT TO CRIMINAL COMPLAINT

1. On or about June 1, 2007, an ICE agent acting in an undercover capacity (UC1) in an internet chat room dedicated to child pornography received information about a new series of child pornography images and videos referred to as, "jenny vids." UC1 was given a list of approximately 8 files names as a means to locate the series. The following six file pathways were given to UC1 as a part of that list:

- a. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_9yo_jenny_loves_sucking_cock.AVI
- b. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_9yo_jenny_enjoying_sucking_cock,_says_dog_cock_is_good_but_daddys_is_better.AVI
- c. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_jenny_9yo_daughter_asking_for_cum,_new.AVI
- d. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_jenny_9yo_sucking_cock,_new,_amatuer.AVI
- e. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_jenny_9yo_sucking_cock_and_moaning,_new,very_hot,_amatuer.AVI
- f. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_jenny_new..9yo_smiling_while_sucking_cock.AVI

The following two file pathways were also given to UC1 and stood out due to the inclusion of an e-mail address embedded in the file name:

- g. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_9yo_jenny_sucking_daddys_cock_while_watching_porn_and_getting_pussy_played_with_till_she_cums_email_request_at_shortgrub09@yahoo.com.AVI. (Emphasis added)
- h. G:\pr0n\Videos\non-adult\jenny\pthc_ptsc_9yo_jenny_sucking_doggie_cock_and_loving_it_email_request_at_shortgrub09@yahoo.com.AVI (Emphasis added)

2. UC1 was unable to obtain images using the exact file names from the previous paragraph, but through further inquiries UC1 was able to locate the following images of child pornography that are believed to be a part of the "jenny vids" series; each image appears to contain the same female minor (heretofore referred to as "V1"):

- a. jenny\pthc_ptsc_jenny_9yo_daughter_swallowing_cum,_new.JPG
 - i. This image contains a close up shot of V1's mouth with her tongue sticking out. A viscous substance can be seen on the right side of her mouth.
- b. jenny\pthc_ptsc_jenny_9yo_tied_up_and_smiling.JPG
 - ii. In this image, V1 is lying on a blanket naked except for black stockings. Her legs are bound by a yellow rope.
- c. jenny\pthc_ptsc_jenny_9yo_naked,_collar,_nylons_watching_porn.JPG
 - iii. In this image, V1 is sitting naked on a bed. The corner of a laptop computer can be seen in the image.
- d. jenny\pthc_ptsc_jenny_9yo_bottomless_in_backseat.JPG

- i. In this image V1 is posing without pants or underwear in the back seat of a pickup truck, displaying her genitals towards the camera.

3. A Customs Summons was issued to Yahoo Inc., requesting information relating to the e-mail address, "shortgrub09@yahoo.com." Information supplied by Yahoo Inc. show the account as being registered to the name, "Ms jenny slave", an account creation date and time of May 16, 2007 at 16:39:49 GMT, and a registration IP address of 68.60.133.88. The IP address 68.60.133.88 is registered to Comcast Cable.

4. A Customs Summons was issued to Comcast Cable requesting information for the IP address 68.60.133.88 as it was assigned between the dates of May 16, 2007 to May 29, 2007. Comcast Cable provided information that listed the Comcast account registered to MW at XXXXX as the only account assigned IP address 68.60.133.88 between the aforementioned dates.

5. On or about June 14, 2007, ICE RAC PORTLAND provided the ICE SAC Detroit with censored copies of the child pornography images mentioned in paragraph 2.

6. On that same date, a local school district informed ICE that XXXXX is listed as the address for two female students. ICE was informed the two students attended A LOCAL SCHOOL

7. On that same date, SA Joshua Edwards showed the Principal of that school, KS, a censored image of V1. KS stated that he was "positive" that V1 is the 9 year old the school student who lives at XXXXX

8. On that same date, ICE discovered that a Michigan Drivers license has been issued to Leo Joseph RUDOLPH at XXXXX. ICE also discovered that a 2002 Ford F350 Super Duty truck is registered to RUDOLPH .

9. On June 15, 2007, SA John Ross and SA Sue Lavoie observed a Ford F-350 Truck parked at XXXXXX. SA Ross observed that the interior of the vehicle was consistent with the interior of the vehicle seen in the image, "jenny\ptsc_jenny_9yo_bottomless_in_backseat.JPG." SA Ross also observed a minor female who he identified as V1. SA Ross stated that he was approximately one foot from V1 when he made the identification.

10. On that same date, the United States District Court for the Eastern District of Michigan authorized a search warrant for the entire premises located at XXXXX.

11. On that same date, the ICE SAC Detroit executed the search warrant on XXXXX. ICE agents identified V1 as a minor female at the residence. During

the search ICE agents discovered several items are that are believed to be items featured in the images, including the Ford F350 registered to RUDOLPH and appearing in image "d" of paragraph 2, yellow rope featured in image "b" of paragraph 2, and blankets featured in images "b" and "c" of paragraph 2.

12. A computer forensic preview conducted of a computer at the residence discovered approximately 8 pornographic images featuring V1 in the unallocated space of the computers memory. Three of these images are described below:

- a. A female minor fitting the physical description of V1 (the minor's face is not fully visible) is lying on a blue blanket without pants or underwear on while a canine licks or smells her genitalia.
- b. In this image V1 is performing oral sex on a canine.
- c. In this image V1 is performing oral sex on an adult male. A blue blanket is visible on the floor.

A blue blanket fitting the general appearance of the blanket in images a and c of this paragraph was discovered at XXXXXX.

13. On that same date, Supervisory Special Agent Mark Langenderfer spoke with the mother of V1, who indicated that RUDOLPH is her boyfriend and has unrestricted access to V1. V1's mother also stated RUDOLPH had been in Florida for three weeks and was scheduled to return on that same date. V1's mother also indicated that RUDOLPH has a laptop that is exclusively used by RUDOLPH.

14. On that same date, ICE SA Corey Howe and SA Zachary Keen arrested Leo RUDOLPH at the Detroit Metropolitan Airport while he was de-boarding a flight from Orlando, Fl. A search of RUDOLPH and his immediate belongs conducted incident to the arrest discovered the following pieces of computer media:

- a. One Sandisk thumb drive
- b. One Mobile Mate thumb drive
- c. One Samsung Digimax 360 digital camera
- d. One Motorola V325i camera phone
- e. One Acer Aspire 5000 laptop computer
- f. Approximately 25 optical disks.

15. Your affiant is informed that during an interview conducted on June 18, 2007, V1 told the forensic examiner that RUDOLPH took sexually explicit pictures of her and showed V1 those pictures on a computer.


16. On June 18, 2007, a United States District Court for the Eastern District of Michigan authorized a search warrant for the items listed "a" though "f" in paragraph 14.

17. On June 19, 2007, an ICE computer forensic agent searching the Acer

Aspire 5000 laptop computer ("d" from paragraph 14) discovered approximately 20 sexually explicit images of V1 and found evidence that the laptop had been used to trade those 20 images over the internet using the Google Hello program.

18. On that same date, a preview of the 25 optical disks revealed approximately 24 sexually explicit images of V1 and 6 sexually explicit videos of V1. Further analysis of the images indicate that approximately 17 of those images were created using a Samsung Digimax 360 digital camera, the same model camera that was in RUDOLPH's possession at the time of his arrest.

19. Based on the aforementioned there is probable cause to believe that Leo RUDOLPH did violate 18 USC Section 2251a.


Special Agent M. Daniel Ben-Meir
U.S. Immigration and Customs Enforcement

Subscribed and sworn
before me this 19th of June 2007

Honorable 
United States Magistrate Judge